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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUENTIN NELSON,

aka "foreveryoung283"
aka "foreveryoung28,"
aka "Inmate AS5147,"

Defendant.

CASE NO. 2:24-CR-00314 DJC

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 15, 2025

TIME: 9:00 a.m.

COURT: Hon. Daniel J. Calabretta

STIPULATION

The United States of America, by and through its counsel of record, Kristin F. Scott, and Quentin Nelson ("Defendant"), by and through his counsel of record, Assistant Public Defender, Noa Oren, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 15, 2025.
2. By this stipulation, the parties now move to continue the status conference until July 31, 2025, at 9:00 a.m., and to exclude time between May 15, 2025, and July 31, 2025, under Local Code T4 and 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).
3. Defendant has been indicted on 2 counts related to child exploitation: Count One charges Defendant with Receipt and Attempted Receipt of Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A), (b)(1); and Count Two charges Defendant with Possession of Prepubescent Child

1 Pornography, in violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2). Due to the nature of the investigation
2 and charges, discovery in this case has been voluminous and will require careful and thorough review by
3 the parties. The parties obtained a joint Protective Order on April 17, 2025, to govern discovery
4 dissemination. (ECF No. 12).

5 4. Accordingly, the parties agree and stipulate, and request that the Court find the following:

- 6 a) Pursuant to the aforementioned Protective Order, the United States has provided
7 counsel for the defendant with a large amount of discovery in this case, which
8 includes records of FBI and CDCR reports, access to full electronic data extractions
9 from multiple devices, search warrant records returns, chat logs, bank records and
10 peer-to-peer payment logs from multiple institutions relating to accounts in various
11 names. The United States has also provided CDCR records, recorded media, and
12 records from various electronic service providers.
- 13 b) Counsel for Defendant desires additional time to work with her Paralegal to review
14 the voluminous produced discovery, inspect the original materials referenced above,
15 consult further with her client, review the current charges, conduct her own research
16 related to further understanding the charges and their basis, and to discuss potential
17 resolutions with her client.
- 18 c) Counsel for Defendant believes that failure to grant the above-requested
19 continuance would deny her the reasonable time necessary for effective preparation,
20 taking into account her exercise of due diligence.
- 21 d) The United States does not object to the brief continuance.
- 22 e) Based on the above-stated findings, the ends of justice served by continuing the
23 case as requested outweigh the interest of the public and Defendant in a trial within
24 the original date prescribed by the Speedy Trial Act.
- 25 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et
26 seq., within which trial must commence, the time period of May 15, 2025 to July
27 31, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A),
28 B(iv) [Local Code T4] because it is a continuance granted at Defendant's request on

the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and Defendant in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: May 12, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Kristin F. Scott
KRISTIN F. SCOTT
Assistant United States Attorney

Dated: May 12, 2025

/s/ Noa Oren
NOA OREN
Counsel for Defendant,
QUENTIN NELSON

ORDER

IT IS SO FOUND AND ORDERED this 12th day of May, 2025.

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT COURT JUDGE